

Thank you for this opportunity to comment on the future of amateur radio licensing in the United States. I have been a licensed amateur radio operator for 36 years, hold an extra class license with the callsign of N4KZ and am very active on the air on all bands and all modes, including Morse Code.

It's been apparent for many years that Morse Code would play less and less of an active role in the amateur service of the future. It's time for Morse Code to rise or fall on its own merits. I favor eliminating mandatory Morse testing for all license classes. Those who enjoy using it, including yours truly and many newcomers will continue and those who don't won't. That's really nothing different than the current situation.

Eliminating mandatory Morse testing is not likely to produce the mayhem on the airwaves that some predict. They cite the Citizens Band radio service as proof of what's coming for the amateur bands. Those are emotional reactions lacking any supporting proof. They conveniently ignore the fact that mandatory written exams remain. I sometimes listen to local CB users and seriously doubt that many of them using CB radio at present will take the time and effort to study for amateur radio exams.

However, I am very disappointed by the Commission's reluctance to adopt a new HF-oriented entry-level license. The technician license class, as an entry-level license, is less than a sterling success. Far too many technician licensees lose interest and drop out of amateur radio. I live in a city of about 30,000 people. From the FCC database, I count a little more than 140 amateur licensees in my city with an estimated 80 percent of those being technician licensees. I am active on the HF and VHF bands and have never heard 95 percent of these licensees on any band or mode. From my observations, many, many technician licensees simply do not participate actively in amateur radio. Why?

Once licensed, new technician licensees find their amateur radio experience to be very disappointing. Newcomers find amateur satellite operation too daunting and those who do operate on local FM repeaters quickly tire, grow bored and drop out – if they ever became active on the air in the first place.

Nations such as Australia and Great Britain have implemented so-called Foundation licenses. The American Radio Relay League proposed what it called the “new” novice license for the 21st century. I fail to understand the Commission's rejection of the ARRL proposal considering that the nation's VECs maintain the examination question pool, compose the exams and then administer them through certified volunteer examiners.

Yes, creating a new entry-level license would require a one-time change in FCC amateur regulations but it would very much be done in the public's interest. In light of recent natural disasters that have struck this country and the failure of the networked communications infrastructure, e.g. cell phones,

public service radio, Internet, etc., amateur radio has once again demonstrated that it's a vital and important resource for this nation.

Thus it would be in the public's interest for the FCC to be more proactive in growing the amateur radio service in the United States.

This can be accomplished in 3 ways:

1. Eliminating mandatory Morse testing for all license classes in the amateur radio service
2. Creating a new entry-level license for HF and VHF. If it needs to be called the technician license for administrative purposes, then so be it.
3. Automatically upgrade all current technician licensees to general class.

These changes to the U.S. amateur radio service's licensing structure would at long last put it in an ideal situation – i.e. a reasonable number of licenses, 3 of them, and testing that makes sense and one that no longer elevates one mode of operation, Morse, beyond anything that really makes sense. In all reality, it's been many, many years since Morse Code conveyed any emergency traffic on the amateur bands on a regular basis.

But I as a pragmatist, I realize the odds are slim the Commission will opt for creating a new entry-level amateur license. I truly believe that's what the FCC should do but I realize the chances of that happening are small. But what I do urge the Commission to do is put the elimination of mandatory Morse testing on the fast track as more than two dozen other nations have already done and surely others will do once the FCC makes that decision. I see absolutely no merit to dragging out this process for many more months. The Commission knows this is a very emotional debate among the nation's amateur operators. Little can be said that will change anyone's mind in this public discourse. But, finally, the majority of amateur operators in the country agree the time has come to eliminate mandatory Morse testing. Dragging this proceeding out for many months to come will accomplish absolutely nothing.

Please, end the long, emotional debate. Just do it.

Respectfully submitted on October 26, 2005.

By David Greer, N4KZ